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August 21, 2023

**MEMO ENDORSED**The Honorable Katherine Polk Failla  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007*Petróleos de Venezuela, S.A. et al. v. MUFG Union Bank, N.A. et al.*, No. 1:19-cv-10023

Dear Judge Failla:

Together with Latham & Watkins LLP, we represent defendants and counterclaim plaintiffs, the Trustee and the Collateral Agent, in this case. We write pursuant to Local Rule 7.1(d) and Rules 2(c) and 2(d) of this Court's Individual Rules of Practice in Civil Cases to respectfully move for a 16-day extension of time, until September 8, 2023, to file a reply memorandum of law in further support of the Trustee and the Collateral Agent's Motion for Order Modifying Partial Stay of Execution of Enforcement ("Motion") filed on June 28, 2023. ECF No. 252. Plaintiff and Counterclaim Defendant PDV Holding, Inc. has consented to the requested extension.

The original deadline for the Trustee and the Collateral Agent's reply memorandum of law is August 23, 2023. This is the Trustee and the Collateral Agent's first request for an extension of time in relation to the Motion. The Trustee and the Collateral Agent had previously consented to two extensions of PDVH's time to oppose the Motion, for a total extension of five

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The Honorable Katherine Polk Failla  
United States District Judge

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weeks, which this Court granted. ECF Nos. 256, 259, 265, 266. The requested extension does not affect any other scheduled dates in this Court.

The requested extension is necessary to provide the Trustee and the Collateral Agent adequate time to respond to arguments raised in PDVH's opposition brief filed August 16, 2023, ECF No. 273, and accompanying fact declarations, ECF Nos. 274, 275, and is also sought in light of counsel's preexisting vacation schedules, the Labor Day holiday, and the prior extensions granted to PDVH.

We are available by telephone to address any questions the Court may have.

Respectfully,

s/ Jonathan H. Hurwitz

Jonathan H. Hurwitz

cc: Counsel of Record (Via ECF)

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket number 276.

Dated: August 21, 2023  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE